

August 18, 2017

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Via Hand Delivery

The Honorable Nicholas G. Garaufis
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, N.Y. 11201

Re: *Securities and Exchange Commission v. Michael L. Cohen and Vanja Baros*,
No. 17 Civ. 430 (E.D.N.Y.)

Dear Judge Garaufis:

We represent Defendant Michael L. Cohen in the above-referenced action. Pursuant to the scheduling order entered on June 9, 2017 (Dkt. No. 30), Mr. Cohen served a motion to dismiss the Amended Complaint on June 27, 2016; the Securities and Exchange Commission ("SEC") served its opposition brief on July 28, 2016; and Mr. Cohen served his reply brief today. **In accordance with Section III.D of Your Honor's Individual Rules, we request that oral argument be held on this motion.**

Pursuant to Individual Rule III.B., we respectfully submit the enclosed courtesy copies of all papers submitted in connection with Mr. Cohen's motion to dismiss the Amended Complaint. The enclosed documents include:

1. Defendant Michael L. Cohen's Notice of Motion to Dismiss the Amended Complaint (Dkt. No. 46);
2. Memorandum of Law in Support of Defendant Michael L. Cohen's Motion to Dismiss the Amended Complaint (Dkt. No. 47);
3. Declaration of Kayvan B. Sadeghi in Support of Defendant Michael L. Cohen's Motion to Dismiss the Amended Complaint, with exhibits (Dkt. No. 48);¹

¹ Certain exhibits are redacted and excerpted to present only the relevant portions of the documents in light of the limited purposes for which they are offered, and consistent with the use of pseudonyms in place of proper

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4. Defendant Michael L. Cohen's Request for Judicial Notice in Support of His Motion to Dismiss the Amended Complaint (Dkt. No. 49);
5. Plaintiff Securities and Exchange Commission's Opposition to Defendant Cohen and Defendant Baros's Motion to Dismiss (Dkt. No. 50);²
6. Reply Memorandum of Law in Further Support of Defendant Michael L. Cohen's Motion to Dismiss the Amended Complaint (Dkt. No. 51); and
7. Reply Declaration of Kayvan B. Sadeghi in Support of Defendant Michael L. Cohen's Motion to Dismiss the Amended Complaint, with exhibit (Dkt. No. 52).

Respectfully submitted,



Ronald G. White

Cc: The Honorable Lois Bloom, United States Magistrate Judge (w/out enclosures)
All counsel of record (w/out enclosures)

names in the Amended Complaint. We conferred with counsel for the SEC concerning the form of the exhibits and they raised no objection.

² The SEC filed a single omnibus opposition brief in response to both defendants' motions to dismiss. Accordingly, we understand the Court will receive another copy of the same opposition brief in connection with the motion to dismiss filed by defendant Vanja Baros.